

EXHIBIT A

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

Alexia R. Brancato
To Call Writer Directly:
+1 212 909 3344
alexia.brancato@kirkland.com

601 Lexington Avenue
New York, NY 10022
United States

+1 212 446 4800

www.kirkland.com

Facsimile:
+1 212 446 4900

June 9, 2020

Via E-mail

Behram Parekh
Kirtlan & Packard LLP
1638 South Pacific Coast Highway
Redondo Beach, CA 90277
bvp@kirtlandpackard.com

Re: *In re Valsartan Products Liability Litigation*, MDL No. 2875 (RBK/JS)

Dear Counsel:

I write regarding the impact of the ESI search terms incorporated in the Court's December 23, 2019 Order (the "Original Search Terms"), Dkt. 328, on Defendants Torrent Pharmaceuticals, Ltd. and Torrent Pharma, Inc. (collectively, "Torrent").

As the Manufacturing Defendants' May 27, 2020 letter to the Court explained, Dkt. 445, the Original Search Terms are overbroad and will create an undue burden for Torrent absent modification.

Torrent's custodial file collection from its nine U.S.-based custodians results in 1,205,488 documents, or about 450 GB of data, in the potential review population.¹ When run against this population, the Original Search Terms yielded 289,349 hits (437,267 with families), or about 303.54 GB of data. This is over 36% of the total review population, and two-thirds of the total data hosted in the workspace. By contrast, the Manufacturer Defendant's counter proposal terms (the "Revised Search Terms") yielded 90,907 hits (203,834 with families), or about 201.81 GB of data. Torrent has attached summaries of hit count reports for the Original Search Terms and Revised Search terms as Exhibits A and B respectively. Torrent anticipates that these numbers

¹ Due to the COVID-19 pandemic and the resulting shutdown in India, Torrent has been unable to collect documents from its nine India-based custodians.

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will at least double once custodial files are collected from the remaining nine custodians located in India. Indeed, the Indian custodians are more involved in the key issues of manufacturing and quality control, and thus hit counts for terms related to these issues will increase significantly once those custodial files are introduced to the potential review pool.

Additionally, the Original Search Terms result in a significant increase in cost compared to the Revised Search Terms. Torrent's e-discovery vendor estimates that, for the nine U.S.-based custodians alone, the cost of hosting, reviewing, and producing the documents responsive to the Original Search Terms will be over \$450,000. In comparison, the estimated cost associated with the Revised Search Terms is less than half of that, or approximately \$213,000. Once collection from the nine India-based custodians is complete, Torrent's costs could approach \$1 million if the Original Search Terms remain in place.

Torrent is actively working with its e-discovery vendor to identify problematic terms and potential solutions. In particular, Torrent has identified certain Original Search Terms as overbroad and unlikely to result in meaningful hits. For example, one of the groups of search terms involves searching "Patel" in combination with "FDA" and "ANDA." Due to the prevalence of the name Patel in India, these terms generated 25,200 and 22,708 hits each. Including families would bring these results to over 70,000 each. A full list of problematic search strings from the Original Search Terms is attached as Exhibit C.

Please let us know when Plaintiffs are available to meet and confer on this issue.

Sincerely,

/s/ Alexia R. Brancato

Alexia R. Brancato

EXHIBIT A**Original Search Terms**

Group	String	Total	Total (Family-Complete)
Standalone	(*11025* OR *18253* OR *202223* OR *203311* OR *203820* OR *20473* OR *205347* OR *20939* OR *23491* OR *24544* OR *24873* OR *29392* OR *77530* OR *78030* OR *90483* OR *90642* OR *90866* OR *91235*)	5,609	20,312
Standalone	EIR OR "establishment inspection report"	3,485	10,316
Standalone	OAI OR "official action indicated"	740	3,044
Standalone	voluntary action indicated	81	311
Standalone	*diethylamine OR "**diethyl amine"	1,085	4,215
Standalone	*dimethylamine OR "**dimethyl amine"	962	3,063
Standalone	*dimethylformamide OR DMF	30,051	90,742
Standalone	*dimethylmethanamide	-	-
Standalone	*ghost*	1,077	2,132
Standalone	*NDEA*	9,113	31,187
Standalone	*NDMA*	5,018	13,150
Standalone	*nitra*	11,938	32,602
Standalone	*nitrite*	1,146	5,429
Standalone	*nitrosa*	1,029	2,975
Standalone	*nitroso*	2,981	8,544
Standalone	*NMBA*	1,955	3,835
Standalone	*trosomine*	2	2
Standalone	(Form 483) OR (Form W/3 483) OR (483 W/3 letter) OR (483 W/3 warn*) OR (704 PRE/3 b)	3,771	7,353
Standalone	C2H6N2O OR "(CH3)2NN O" OR "CH32NN O" OR "(CH3)2NC(O)H" OR CH32NCOH OR C3H7NO OR "(CH3CH2)2NH" OR CH3CH22NH OR C4H11N OR "(CH3)2NH" OR CH32NH OR C2H7N OR "(C2H5)2NNO" OR C2H52NNO OR C4H10N2O	19	88
Standalone	carcin*	20,176	75,765
Standalone	FDA W/10 warning	4,426	7,962
Standalone	gene* W/3 mutat*	3,062	14,036
Standalone	genotoxic*	5,466	49,819
Standalone	(solvent W/5 cancer*) OR (solvent W/5 toxic) OR (solvent W/5 hazard*) OR (solvent W/5 fatal)	31	142
Standalone	solvent* W/5 contamin*	140	1,133
Standalone	(test* W/5 canc*) AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))	165	249
Standalone	tetrazol*	1,605	8,139
Standalone	Valisure*	23	39
Standalone	(deviat* W/5 cancer*) OR (deviat* W/5 toxic) OR (deviat* W/5 hazard*) OR (deviat* W/5 fatal)	4	5
Authors or Inspectors	Agrawal	5,058	12,646
Authors or Inspectors	Agrawal W/3 Atul	17	27
Authors or Inspectors	Akhtar	23	69
Authors or Inspectors	Akhtar W/3 Saleem	-	-
Authors or Inspectors	Amin	606	2,703
Authors or Inspectors	Amin W/3 Pankaj	3	12
Authors or Inspectors	Arasu	3	7
Authors or Inspectors	Arista	37	86
Authors or Inspectors	Arroyo	681	2,037
Authors or Inspectors	Baker	2,375	6,159
Authors or Inspectors	Baker W/3 Peter	18	29
Authors or Inspectors	Barreto	65	187
Authors or Inspectors	Barrowcliff	2	4
Authors or Inspectors	Bellamy	73	152
Authors or Inspectors	Bernard	515	1,380
Authors or Inspectors	Bernard W/3 Tonia	-	-
Authors or Inspectors	Bizjak	12	18
Authors or Inspectors	Boyd	412	964
Authors or Inspectors	Boyd W/3 Justin	23	43

Group	String	Total	Total (Family-Complete)
Authors or Inspectors	Bretz	30	51
Authors or Inspectors	Bretz W/3 Paula	24	46
Authors or Inspectors	Brown	5,750	21,737
Authors or Inspectors	Brown W/3 Darren	1	1
Authors or Inspectors	Cartwright	1,000	2,407
Authors or Inspectors	Casale	68	179
Authors or Inspectors	Chapman	814	2,422
Authors or Inspectors	Chapman W/3 Johnathan	-	-
Authors or Inspectors	Charity	832	1,651
Authors or Inspectors	Charity W/3 Antony	-	-
Authors or Inspectors	Chester	1,390	4,285
Authors or Inspectors	Chester W/3 Bonita	1	1
Authors or Inspectors	Clausen	48	77
Authors or Inspectors	Cosgrove	165	280
Authors or Inspectors	Cruz	4,977	9,642
Authors or Inspectors	Della	1,586	4,295
Authors or Inspectors	Dellareese	1	1
Authors or Inspectors	Dezan	2	12
Authors or Inspectors	Dickinson	1,006	2,791
Authors or Inspectors	Dickinson W/3 Gwyn	10	34
Authors or Inspectors	Dobbin	84	177
Authors or Inspectors	Dombrowski	16	21
Authors or Inspectors	Donald	1,194	2,982
Authors or Inspectors	Donald W/3 Steven	4	4
Authors or Inspectors	Dong	320	1,041
Authors or Inspectors	Dong W/3 Eric	1	6
Authors or Inspectors	Eban	7	89
Authors or Inspectors	Ernst	626	1,908
Authors or Inspectors	Estrella	243	592
Authors or Inspectors	Estrella W/3 Maria	1	1
Authors or Inspectors	Etminan	13	66
Authors or Inspectors	Ford	1,348	4,301
Authors or Inspectors	Ford W/3 Susanna	-	-
Authors or Inspectors	Frazier	498	1,224
Authors or Inspectors	Frazier W/3 Laurie	-	-
Authors or Inspectors	Gavini	31	154
Authors or Inspectors	George	2,760	7,992
Authors or Inspectors	George W/3 Jogy	98	352
Authors or Inspectors	Ghoshal	1	1
Authors or Inspectors	Ghoshal W/3 Rabin	-	-
Authors or Inspectors	Gidado	1	2
Authors or Inspectors	Goga	287	540
Authors or Inspectors	Goga	263	506
Authors or Inspectors	Goga W/3 Michael	46	111
Authors or Inspectors	Hall	2,409	7,142
Authors or Inspectors	Hall W/3 Patrice	23	46
Authors or Inspectors	Hallas	20	692
Authors or Inspectors	Harouaka	8	12
Authors or Inspectors	Hebert	172	492
Authors or Inspectors	Hicks	346	847
Authors or Inspectors	Hicks W/3 Kellia	7	36
Authors or Inspectors	Higgins	426	1,254
Authors or Inspectors	Higgins W/3 Brooke	1	1
Authors or Inspectors	Huaren	17	38
Authors or Inspectors	Hustedt	2	3
Authors or Inspectors	Johansen	61	126
Authors or Inspectors	Jones	2,990	9,326

Group	String	Total	Total (Family-Complete)
Authors or Inspectors	Jones W/3 Latoria	-	-
Authors or Inspectors	Karapetyan*	47	101
Authors or Inspectors	Khan	839	2,786
Authors or Inspectors	Khan W/3 Farhana	7	24
Authors or Inspectors	Khurana	59	131
Authors or Inspectors	Khurana W/3 Sangeeta	2	3
Authors or Inspectors	Kristensen	17	83
Authors or Inspectors	Lopez	1,236	3,219
Authors or Inspectors	Lopez W/3 Rubet	39	73
Authors or Inspectors	Maldonado	217	461
Authors or Inspectors	Mankind	204	575
Authors or Inspectors	Mansournia	-	-
Authors or Inspectors	Marcisin	1	3
Authors or Inspectors	Martinez	1,036	3,157
Authors or Inspectors	Martinez W/3 Miguel	3	13
Authors or Inspectors	Mason	1,944	4,464
Authors or Inspectors	Mason W/3 James	34	60
Authors or Inspectors	Mathew	810	3,515
Authors or Inspectors	Mathew W/3 Lata	96	350
Authors or Inspectors	Mathews	330	890
Authors or Inspectors	Mathews W/3 Lata	-	-
Authors or Inspectors	Mayasandra	-	-
Authors or Inspectors	Mayasandra W/3 Pal	-	-
Authors or Inspectors	Melende	-	-
Authors or Inspectors	Min	16,475	59,152
Authors or Inspectors	Min W/3 Ko	16	29
Authors or Inspectors	Mistler	1	1
Authors or Inspectors	Motamed	39	46
Authors or Inspectors	Motta	177	1,121
Authors or Inspectors	Mueller	844	2,140
Authors or Inspectors	Narula	92	190
Authors or Inspectors	Navas	11	51
Authors or Inspectors	Nguyen	1,544	5,127
Authors or Inspectors	Nguyen W/3 Truong	1	1
Authors or Inspectors	Oladimeji	7	17
Authors or Inspectors	Panicker	98	247
Authors or Inspectors	Patel	51,524	147,034
Authors or Inspectors	Patel W/3 Nayan	3	5
Authors or Inspectors	Philopoulos	16	23
Authors or Inspectors	Pitts	285	711
Authors or Inspectors	Pitts W/3 Simone	1	2
Authors or Inspectors	Podaralla	25	143
Authors or Inspectors	Podaralla W/3 Satheesk	-	-
Authors or Inspectors	Pottgard	13	29
Authors or Inspectors	Priester	187	804
Authors or Inspectors	Pyramides	-	-
Authors or Inspectors	Quartarolo	-	-
Authors or Inspectors	Ray	4,029	20,367
Authors or Inspectors	Ray W/3 Marcus	3	5
Authors or Inspectors	Razzaghi	1	2
Authors or Inspectors	Razzaghi W/3 Frederick	-	-
Authors or Inspectors	Roberts	910	2,504
Authors or Inspectors	Roberts W/3 Daniel	9	14
Authors or Inspectors	Roy	1,019	3,208
Authors or Inspectors	Roy W/3 Melissa	6	9
Authors or Inspectors	Schwartz	961	2,834
Authors or Inspectors	Schwartz W/3 Pau	-	-

Group	String	Total	Total (Family-Complete)
Authors or Inspectors	Shah	32,605	76,691
Authors or Inspectors	Shah W/3 Dipesh	24	50
Authors or Inspectors	Skanchy	259	809
Authors or Inspectors	Srivasta	3	14
Authors or Inspectors	Srivastava	790	2,238
Authors or Inspectors	Srivastava W/3 Rajiv	-	-
Authors or Inspectors	Stieg	3	5
Authors or Inspectors	Sweeney	445	1,322
Authors or Inspectors	Szestypalow	2	3
Authors or Inspectors	Tomasso	4	4
Authors or Inspectors	Ulysse	84	381
Authors or Inspectors	Upadhyay	39	292
Authors or Inspectors	Upadhyay W/3 Pratik	-	-
Authors or Inspectors	Verdel	-	-
Authors or Inspectors	Wakijira	-	-
Authors or Inspectors	Wakijira W/3 Chaltu	-	-
Authors or Inspectors	Wang	1,449	4,421
Authors or Inspectors	Wang W/3 Zhao	115	420
Authors or Inspectors	Warnick	36	117
Authors or Inspectors	Xu	1,230	5,109
Authors or Inspectors	Xu W/3 Atul	-	-
Authors or Inspectors	Young	8,193	29,029
Authors or Inspectors	Young W/3 Rochelle	1	1
Authors or Inspectors	Yuscus	-	-
Authors or Inspectors	Zaklady	57	201
Authors or Inspectors	Zamil	6	10
Authors or Inspectors	Zamperini	-	-
Authors or Inspectors	Zhen	86	145
Authors or Inspectors	Zhen W/3 Zhou	-	-
Regulatory	("adverse event*" OR AER) and (<drug name> OR <solvents> OR <facility names>)	12,235	52,877
Regulatory	changes being effected	2,641	11,209
Regulatory	prior approval supplement	2,018	6,176
Regulatory	adulterat*	1,930	5,389
Regulatory	alert*	22,376	79,411
Regulatory	CAPA OR (corrective PRE/3 "preventive action")	7,645	17,339
Regulatory	CFR OR eCFR OR "code of federal regulations" OR USC OR "United States Code" OR "Title 21"	32,421	103,390
Regulatory	Citizen* PRE/3 Petition	736	1,358
Regulatory	(Establishment PRE/3 Inspection)	804	2,852
Regulatory	import* W/3 (ban OR alert OR restrict*)	810	1,579
Regulatory	inadequat*	6,664	25,678
Regulatory	inspect*	38,761	116,717
Regulatory	investigat*	39,227	112,156
Regulatory	major W/3 change	1,078	4,395
Regulatory	(master W/3 file) and (<drug name> OR <solvents>)	2,482	19,882
Regulatory	minor W/3 change	1,659	5,691
Regulatory	moderate W/3 change	169	1,229
Regulatory	Monthly W/3 update	515	1,016
Regulatory	observation*	19,074	59,014
Regulatory	OOS OR "out of spec*" OR "out-of-spec"	8,030	20,091
Regulatory	OOT OR "out-of-trend" OR "out of trend"	3,027	9,463
Regulatory	PADER* and (<drug name> OR <solvents> OR <facility names>)	8,580	26,072
Regulatory	violat*	10,694	29,605
Regulatory	warn*	40,003	111,163
Regulatory	((official PRE/3 action*) W/4 indicat*)	97	371
Regulatory	VAI OR ((voluntary PRE/3 action*) W/4 indicat*)	553	1,620

Group	String	Total	Total (Family-Complete)
cGMP	(bottle PRE/2 lies) OR Eban	6	88
cGMP	bury OR burie* OR conceal*	1,749	5,193
cGMP	cGMP* OR (current PRE/5 manufacturing) OR GMP*	23,292	52,630
cGMP	"cover up*" OR coverup* OR "cover-up"	194	377
cGMP	crash* OR disaster*	2,938	6,538
cGMP	(data W/4 integrity) OR (data W/4 reliabl*)	4,370	9,397
cGMP	delet* OR destroy* OR remov* OR trash* OR shred*	125,709	268,769
cGMP	hide* OR suppress*	11,160	62,628
cGMP	whistleblow*	687	1,280
QA Testing	anion-exchange OR anionexchange OR "anion exchange"	140	401
QA Testing	ion-exchange OR ionexchange OR "ion exchange"	350	1,835
QA Testing	*PCRC*	99	648
QA Testing	aberran*	773	2,793
QA Testing	abnorm*	12,284	52,964
QA Testing	ALS	1,857	6,522
QA Testing	bioequiv*	11,901	61,953
QA Testing	CAPA OR (corrective PRE/5 action)	11,970	42,027
QA Testing	Chromato*	12,810	38,511
QA Testing	complain*	15,161	38,651
QA Testing	contami*	12,274	31,709
QA Testing	degradant* OR impurit*	29,276	87,804
QA Testing	detect*	31,916	110,580
QA Testing	El-MS OR EL-MS OR "electron ionization"	42	116
QA Testing	elude*	61	171
QA Testing	fail*	40,344	120,249
QA Testing	fatal*	9,407	39,824
QA Testing	GC OR "GC-FID" OR GCMS OR "GC-MS"	10,598	38,323
QA Testing	hazard*	11,817	36,771
QA Testing	headspace	849	4,943
QA Testing	heat	11,334	38,224
QA Testing	HPLC-UV	390	1,424
QA Testing	HS	5,298	26,794
QA Testing	incomplet* W/5 data*	282	1,496
QA Testing	LCMS	439	1,357
QA Testing	mass spectro*	1,655	6,729
QA Testing	method W/5 qualification	514	1,551
QA Testing	noise*	1,888	8,162
QA Testing	noti* w/5 pharm*	4,676	16,480
QA Testing	obscure*	589	1,968
QA Testing	observation*	18,537	59,003
QA Testing	peak*	18,450	61,738
QA Testing	press W/4 release	2,409	5,886
QA Testing	preventative W/5 action	432	1,638
QA Testing	problem*	27,134	92,821
QA Testing	puri*	21,776	62,139
QA Testing	quality	87,073	194,566
QA Testing	recall*	33,193	60,255
QA Testing	repe* W/4 error*	243	793
QA Testing	residu*	19,353	58,644
QA Testing	retrospec*	3,023	14,636
QA Testing	risk*	40,074	120,561
QA Testing	signal*	7,194	34,332
QA Testing	spectro*	4,547	21,107
QA Testing	spike*	4,604	15,585
QA Testing	suitab*	15,519	48,658
QA Testing	toxic*	24,956	92,947
QA Testing	unknown* OR unk OR unks	27,858	103,895

Group	String	Total	Total (Family-Complete)
QA Testing	validat*	54,786	136,253
Manufacturing	(backup W/3 data)	533	1,601
Manufacturing	(impurit* AND degradant*)	1,592	6,101
Manufacturing	recall*	33,193	60,255
Manufacturing	residu*	19,353	58,644
Manufacturing	solvent*	16,576	47,849
Manufacturing	spike*	4,604	15,585
Manufacturing	test*	121,951	248,111
Manufacturing	(unknown W/3 peak)	396	1,864
Manufacturing	(unknown W/3 spike)	1	1
Manufacturing	(unknown W/3 impurit*)	7,119	21,275
Manufacturing	(unknown W/3 contamin*)	17	132
Medical Conditions	bladder*	1,536	9,874
Medical Conditions	blood*	11,922	44,911
Medical Conditions	cancer* OR precancer* OR pre-cancer*	4,430	17,176
Medical Conditions	colon*	4,109	22,341
Medical Conditions	death* OR dead OR fatal	7,083	28,132
Medical Conditions	esophag*	1,085	7,484
Medical Conditions	gastro*	5,232	24,372
Medical Conditions	intestin*	2,075	12,075
Medical Conditions	kidn* OR renal*	6,039	25,326
Medical Conditions	laten*	729	4,635
Medical Conditions	leukemia*	922	4,152
Medical Conditions	liver*	5,657	22,861
Medical Conditions	lymphoma*	1,747	10,078
Medical Conditions	muta*	4,106	19,245
Medical Conditions	myeloma*	546	2,494
Medical Conditions	NHL OR non-hodgkin*	324	1,571
Medical Conditions	toxicolog*	6,234	31,422
Medical Conditions	onset*	3,508	16,864
Medical Conditions	oncolog*	1,985	6,624
Medical Conditions	ovar*	1,412	7,082
Medical Conditions	pancrea*	2,601	13,656
Medical Conditions	prostate*	1,739	9,148
Medical Conditions	stomach*	2,682	14,332
Economic Terms	AWP OR "average wholesale price" OR WAC OR "wholesale acquisition cost"	7,312	14,675
Economic Terms	best W/3 pric*	698	2,487
Economic Terms	bulk W/3 suppl*	161	599
Economic Terms	impairment	3,857	18,509
Economic Terms	IRR	347	1,794
Economic Terms	manufactur* W/3 cost*	530	1,838
Economic Terms	marginal W/5 cost*	10	122
Economic Terms	market* W/5 share*	3,528	9,044
Economic Terms	net W/5 profit*	575	1,634
Economic Terms	net W/5 valu*	644	2,509
Economic Terms	NPA	1,676	3,432
Economic Terms	NPV	671	2,277
Economic Terms	rate W/10 return	211	726
Economic Terms	rebate*	4,597	10,560
Economic Terms	(sourc* w/5 agree*) OR (sourc* w/5 anal*) OR (sourc* w/5 contract*) OR (sourc* w/5 forecast*) OR (sourc* w/5 plan*) OR (sourc* w/5 strat*)	2,615	8,625
Economic Terms	(suppl* w/5 agree*) OR (suppl* w/5 anal*) OR (suppl* w/5 contract*) OR (suppl* w/5 forecast*) OR (suppl* w/5 plan*) OR (suppl* w/5 strat*)	4,221	15,700
Economic Terms	SWOT OR (strength PRE/7 threat*)	36	137
Economic Terms	writ* PRE/5 off	563	1,885

Group	String	Total	Total (Family-Complete)
Economic Terms	(ABDC OR Amerisource* OR "American Health Packaging" OR AHP) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	3,601	9,457
Economic Terms	(AG) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR gross OR gross OR loss)	3,153	11,795
Economic Terms	(amerisource*) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	3,294	8,677
Economic Terms	(ANDA) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	18,217	54,882
Economic Terms	(ASB) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	97	187
Economic Terms	(Authorized W/4 generic) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share)	540	1,677
Economic Terms	(average OR avg) AND (pric* OR cost* OR margin* OR profit* OR revenue*)	4,713	15,363
Economic Terms	(avg) AND (pric* OR cost* OR margin* OR profit* OR revenue*)	2,069	4,873
Economic Terms	(boehringer ingelheim) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	1,180	3,732
Economic Terms	(cardinal) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	4,956	13,173
Economic Terms	(contract) AND (distrib* OR PBM)	5,848	16,209
Economic Terms	(cost*) AND (analy* OR forecast* OR plan* OR strat*)	7,736	22,323
Economic Terms	(CVS*) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	5,259	13,206
Economic Terms	(Epic) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	1,289	3,114
Economic Terms	(ESI) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	1,342	4,259
Economic Terms	(Express*) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	7,219	27,062
Economic Terms	(IMS) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share)	3,398	9,877
Economic Terms	(IQVIA) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share)	860	1,936
Economic Terms	(Kroger) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	2,427	6,523
Economic Terms	(mckesson) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	6,173	15,175
Economic Terms	(operat* w/5 margin*) AND (margin* OR profit*)	199	599
Economic Terms	(Optum*) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	2,335	6,354
Economic Terms	(pric*) AND (decreas* OR increas* OR list* OR strat* OR expect* OR project*)	13,332	28,800
Economic Terms	(recall) AND (loss OR impair* OR write* OR reimburs* OR indemn* OR charg* OR replace*)	2,610	11,006
Economic Terms	(Redoak) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	227	874
Economic Terms	(retail) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share)	4,785	14,001
Economic Terms	(Rite*) AND (pric*)	2,412	6,605
Economic Terms	(sales) W/5 (expect* OR project*)	1,366	4,899
Economic Terms	(var*) W/5 (cost*)	373	1,301
Economic Terms	(variable) W/5 (cost*)	62	307
Economic Terms	(Walgreen* OR WBDA) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	4,724	10,808
Economic Terms	(Walmart) AND (pric* OR cost OR market* OR AWP OR WAC OR profit OR margin* OR stock OR share OR indemn* OR indemn* OR loss)	2,962	6,998
Entities	Alembic	1,783	5,167

Group	String	Total	Total (Family-Complete)
Entities	ABDC OR Amerisource* OR "American Health Packaging" OR AHP	4,620	12,302
Entities	Amerigen	682	1,719
Entities	ANDA	28,262	65,833
Entities	Auro* OR APL OR APUSA	5,523	14,817
Entities	boehringer ingelheim	1,446	4,315
Entities	Bristol	2,425	7,829
Entities	Camber	2,243	5,931
Entities	Cobalt	762	2,407
Entities	distribut*	28,730	78,197
Entities	Forest	2,158	6,116
Entities	Hetero	4,469	12,398
Entities	Huahai	2,000	5,674
Entities	Indoco	1	3
Entities	Ivax	449	1,284
Entities	Jubilant	1,559	5,330
Entities	Lantech*	13	19
Entities	Macleod*	1,398	3,887
Entities	Matrix	3,690	12,382
Entities	Mylan	6,842	19,497
Entities	Novartis	4,335	11,610
Entities	Par	4,770	14,611
Entities	Prinston	364	904
Entities	Qualanex	2,657	5,187
Entities	Ranbaxy	4,264	10,148
Entities	Sandoz	3,931	9,251
Entities	Syncore	11	18
Entities	Synthon	1,105	2,125
Entities	Teva	6,310	14,927
Entities	Torrent	69,343	111,799
Entities	Unichem	2,549	9,196
Entities	Watson	2,235	5,782
Entities	Zhejiang*	2,034	6,123
Entities	ZHP	123	364

EXHIBIT D
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Revised Search Terms

Group	Provided String	String Total	String Total (Family-Complete)
Standalone	(*90483* OR *90866* OR *78020*)	4,103	13,956
Standalone	(EIR OR "establishment inspection report") AND <facility name> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))	725	4,185
Standalone	(OAI or "official action indicated") AND <facility name> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))	295	1,056
Standalone	("voluntary action indicated") AND <facility name> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))	3	5
Standalone	*diethylamine or "**diethyl amine"	1,125	4,489
Standalone	*dimethylamine or "**dimethyl amine"	996	3,458
Standalone	*dimethylformamide	1,194	5,556
Standalone	*dimethylmethanamide	-	-
Standalone	*ghost*	1,077	2,132
Standalone	*NDEA*	9,113	31,187
Standalone	*NDMA*	5,018	13,150
Standalone	*nitra*	11,938	32,602
Standalone	*nitrite*	1,146	5,429
Standalone	*nitrosa*	1,029	2,975
Standalone	*nitroso*	2,981	8,544
Standalone	*NMBA* (deferred to after JPML decision)	1,955	3,835
Standalone	*trosomine*	2	2
Standalone	((Form483) or (Form /3 483) or (483 /3 letter) or (483 /3 warn*) or (704 pre/3 b)) AND <facility name> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))	351	1,139
Standalone	C2H6N2O or "(CH3)2NN=O" or "CH32NN=O" or "(CH3)2NC(O)H" or CH32NCOH or C3H7NO or "(CH3CH2)2NH" or CH3CH22NH or C4H11N or "(CH3)2NH" or CH32NH or C2H7N or "(C2H5)2NNO" or C2H52NNO or C4H10N2O	28	110
Standalone	carcin* AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))	6,453	23,875
Standalone	deviat* /5 cancer* or deviat* /5 toxic or or deviat* /5 hazard* or deviat* /5 fatal	4	5
Standalone	(FDA /10 warning) AND <facility name> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))	336	807
Standalone	gene* /3 mutat*	3,062	14,036
Standalone	genotoxic* AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))	1,567	8,389
Standalone	solvent /5 cancer* or solvent /5 toxic or or solvent /5 hazard* or solvent /5 fatal	32	143

Group	Provided String	String Total	String Total (Family-Complete)
Standalone	solvent* /5 contamin*	140	1,133
Standalone	(test* /5 canc*) AND (<Drug Name> OR <Solvents> AND NOT <other drug names>))	208	631
Standalone	Valisure*	23	39
Regulatory	("adverse event*" or AER) /50 <drug name> /50 <medical conditions>	231	1,691
Regulatory	"prior approval supplement" /50 (<drug name> OR (ANDA Numbers))	79	160
Regulatory	adulterat* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR <facility names>)	83	432
Regulatory	alert* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR <facility names>)	1,495	4,851
Regulatory	Citizen* pre/3 Petition /50 (<drug name> OR <Solvents> AND NOT <other drug names>)) OR <facility names>)	64	115
Regulatory	import* /3 (ban or alert or restrict*) /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	57	86
Regulatory	inadequat* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR <facility names>)	502	3,387
Regulatory	inspect* /50 <drug name>	645	2,774
Regulatory	investigat* /50 <drug name>	722	3,416
Regulatory	major /3 change /50 (<drug name> OR <Solvents> AND NOT <other drug names>)) OR (*78020* OR *90866* OR *90483*)	24	111
Regulatory	minor /3 change /50 (<drug name> OR <Solvents> AND NOT <other drug names>)) OR (*78020* OR *90866* OR *90483*)	103	387
Regulatory	moderate /3 change /50 (<drug name> OR <Solvents> AND NOT <other drug names>)) OR (*78020* OR *90866* OR *90483*)	6	18
Regulatory	Monthly /3 update /50 (<drug name> or <Solvents> AND NOT <other drug names>)))	61	145
Regulatory	(official pre/3 action* /4 indicat*) /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR <facility names>)	15	141
Regulatory	observation* /50 (<drug name> OR <facility name>)	1,950	6,483
Regulatory	(OOS or "out of spec*" or "out-of-spec*") /50 <drug name> OR (<Solvents> AND NOT <other drug names>)) OR <facility names>)	1,291	5,482

Group	Provided String	String Total	String Total (Family-Complete)
Regulatory	(OOT or "out-of-trend" or "out of trend") /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR <facility names>)	361	1,745
Regulatory	PADER* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR <facility names>)	2,538	14,011
Regulatory	VAI or (voluntary pre/3 action* /4 indicat*) /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR <facility names>)	61	165
Regulatory	violat* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR <facility names>)	283	837
QA Testing	("anion-exchange" OR anionexchange OR "anion exchange") /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	11	12
QA Testing	("ion-exchange" OR ionexchange OR "ion exchange") /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	162	1,548
QA Testing	*PCRC* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	-	-
QA Testing	ALS /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	54	281
QA Testing	bioequiv* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	904	2,866
QA Testing	(CAPA or corrective pre/3 "preventive action") /50 <facility name> /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR QA OR "quality assurance" OR QC OR "quality control" OR Chromato* OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	456	1,970
QA Testing	Chromato* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	2,925	14,458

Group	Provided String	String Total	String Total (Family-Complete)
QA Testing	contami* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*")	2,276	7,496
QA Testing	degradant* or impurit* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	14,327	43,664
QA Testing	detect* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	7,749	31,338
QA Testing	EI-MS or EL-MS or "electron ionization" /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	15	42
QA Testing	elude* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	2	2
QA Testing	fatal* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	838	5,282
QA Testing	GC or "GC-FID" or GCMS or "GC-MS" /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	1,250	5,289
QA Testing	hazard* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	1,893	6,962
QA Testing	heat /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	889	3,771
QA Testing	HPLC-UV /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	40	127

Group	Provided String	String Total	String Total (Family-Complete)
QA Testing	HS /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	383	1,367
QA Testing	incomplet* /5 data* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR facilities names OR test OR chromatog* OR peak)	38	203
QA Testing	LCMS (<drug name> OR (<Solvents> AND NOT <other drug names>)))	30	83
QA Testing	mass spectro* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	192	1,098
QA Testing	"method /5 qualification" /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	5	14
QA Testing	noise* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	315	1,336
QA Testing	"noti* w/5 pharm*" /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	591	2,167
QA Testing	obscure* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	70	243
QA Testing	"press /4 release" /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	560	2,119
QA Testing	"preventative /5 action" /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	24	185
QA Testing	puri* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	3,560	16,424
QA Testing	recall* /50 <drug name>	3,413	8,047

Group	Provided String	String Total	String Total (Family-Complete)
QA Testing	"repe* /4 error*" /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	6	47
QA Testing	residu* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	3,991	17,441
QA Testing	retrospec* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)))	76	430
QA Testing	risk* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 spike" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	8,857	36,739
QA Testing	signal* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	1,126	5,303
QA Testing	spectro* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	522	2,463
QA Testing	spike* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	483	2,350
QA Testing	suitab* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	2,207	9,918

Group	Provided String	String Total	String Total (Family-Complete)
QA Testing	toxic* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR aberran /3 peak* OR abnorm* OR complain* OR "unknown /3 peak" OR "unknown /3 impurit*" OR "unknown /3 contamin*")	4,425	25,401
Medical Conditions	bladder*	234	1,542
Medical Conditions	cancer* or precancer* or pre-cancer*	1,072	4,054
Medical Conditions	colon*	522	3,213
Medical Conditions	death* or dead or fatal	2,362	13,659
Medical Conditions	esophag*	502	2,068
Medical Conditions	gastro*	816	6,030
Medical Conditions	intestin*	304	1,876
Medical Conditions	kidn* or renal*	2,898	17,355
Medical Conditions	laten*	27	188
Medical Conditions	leukemia*	59	194
Medical Conditions	liver*	1,461	6,887
Medical Conditions	lymphoma*	328	1,926
Medical Conditions	muta*	915	5,378
Medical Conditions	myeloma*	43	79
Medical Conditions	NHL or non-hodgkin*	46	126
Medical Conditions	toxicolog*	974	5,933
Medical Conditions	onset*	716	5,738
Medical Conditions	oncolog*	117	248
Medical Conditions	ovar*	215	1,304
Medical Conditions	pancrea*	174	1,165
Medical Conditions	prostate*	159	683
Medical Conditions	stomach*	830	4,154
Manufacturing	"PROCESS I" or "PROCESS II"	260	795
Manufacturing	assay*	9,267	40,092
Manufacturing	assessment*	3,773	21,251
Manufacturing	batch /5 records	653	3,108
Manufacturing	biocompat*	30	81
Manufacturing	byproduct*	37	314
Manufacturing	certificat*	4,170	14,651
Manufacturing	change* /3 control*	734	4,733
Manufacturing	change* /5 process*	923	4,194
Manufacturing	COA or certificat* pre/3 analys*	2,330	10,392
Manufacturing	concentra*	8,321	37,142
Manufacturing	condensa*	239	3,023
Manufacturing	conversion*	898	5,182
Manufacturing	critical /4 change	6	47
Manufacturing	crude*	754	5,093
Manufacturing	deviat*	1,919	10,757
Manufacturing	diastereo*	71	398
Manufacturing	discrepanc*	367	1,550

Group	Provided String	String Total	String Total (Family-Complete)
Manufacturing	esterficat*	-	-
Manufacturing	*formaldehyde*	645	3,588
Manufacturing	malfunct*	32	123
Manufacturing	material* /3 loss*	12	106
Manufacturing	moiety or moieties	308	1,285
Manufacturing	process /5 change	666	2,539
Manufacturing	quench*	277	1,315
Manufacturing	reagent*	2,313	15,266
Manufacturing	reclaim*	3	7
Manufacturing	recover*	4,736	31,764
Manufacturing	recycl* /2 solvent AND <drug name>	8	16
Manufacturing	repack* or "re-pack*"	2,669	9,352
Manufacturing	resal*	10	39
Manufacturing	resell*	-	-
Manufacturing	reuse*	29	68
Manufacturing	ring*	1,183	6,209
Manufacturing	suppress*	526	3,407
Manufacturing	TEA or Triethyl*	6,331	26,896
Manufacturing	temperature	8,565	38,052
Manufacturing	TIN or Tributyl*	2,863	10,188
Manufacturing	yield*	1,009	6,882
Entities	Alembic	753	2,658
Entities	ABDC or Amerisource* or "American Health Packaging" or AHP	1,814	4,577
Entities	Amerigen	14	56
Entities	ANDA /3 Inc*	1,120	3,206
Entities	Auro* or APL or APUSA	1,565	5,065
Entities	boehringer ingelheim	441	1,350
Entities	Bristol	234	787
Entities	Camber	767	2,716
Entities	Cobalt	229	701
Entities	Forest	181	441
Entities	Hetero	2,547	8,007
Entities	Huahai	2,777	9,047
Entities	Indoco	16	84
Entities	Ivax	57	125
Entities	Jubilant	539	1,687
Entities	Lantech*	-	-
Entities	Macleod*	730	2,066
Entities	Matrix	1,415	3,498
Entities	Mylan	4,026	15,260
Entities	Novartis	3,859	12,142
Entities	Par	1,345	4,810
Entities	Prinston	243	701
Entities	Qualanex	1,172	3,264

Group	Provided String	String Total	String Total (Family-Complete)
Entities	Ranbaxy	2,222	6,234
Entities	Sandoz	1,288	4,669
Entities	Syncore	-	-
Entities	Synthon	242	542
Entities	Teva	2,629	7,428
Entities	Torrent	28,236	70,124
Entities	Unichem	2,022	7,587
Entities	Watson	438	1,599
Entities	Zhejiang*	2,529	8,352
Entities	ZHP	70	333
cGMP	((bottle pre/2 lies) or Eban) /50 ("inspect*" OR "FDA" OR "Food /50 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "Agency" OR "recall" OR <medical conditions> OR <drug name> OR (<Solvents> AND NOT <other drug names>)) OR test OR chromatog* OR peak)	4	150
cGMP	(bury OR burie* OR conceal*) /50 ("inspect*" OR "FDA" OR "Food /50 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "Agency" OR "recall" OR <medical conditions> OR <drug name> OR (<Solvents> AND NOT <other drug names>)) OR test OR chromatog* OR peak)	482	1,738
cGMP	(cGMP* or (current pre/5 manufacturing) or GMP*) /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR inspect* OR violat*	9,491	26,281
cGMP	("cover up*" or coverup* or "cover-up*") /50 ("inspect*" OR "FDA" OR "Food /50 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "Agency" OR "recall" OR <medical conditions> OR <drug name> OR (<Solvents> AND NOT <other drug names>)) OR test OR chromatog* OR peak)	94	136
cGMP	(crash* or disaster*) /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR "backup /3 data" OR "test")	312	948
cGMP	(data /4 integrity or data /4 reliabl*) /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR "backup /3 data" OR "test" or chromatog*)	473	1,084

Group	Provided String	String Total	String Total (Family-Complete)
cGMP	(destroy* NOT "immediately destroy all electronic") /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR facilities names OR test OR chromatog* OR backup /3 data)	1,889	4,937
cGMP	delet* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR facilities names OR test OR chromatog* OR backup /3 data)	6,735	22,897
cGMP	destroy* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR facilities names OR test OR chromatog* OR backup /3 data)	1,919	4,938
cGMP	trash* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR facilities names OR test OR chromatog* OR backup /3 data)	32	74
cGMP	shred* /50 (<drug name> OR (<Solvents> AND NOT <other drug names>)) OR facilities names OR test OR chromatog* OR backup /3 data)	192	363
cGMP	(hide* OR suppress*) /50 ("inspect*" OR "FDA" OR "Food /50 Drug Administration" OR FDA OR USFDA OR "USFDA" OR "Agency" OR "recall" OR <medical conditions> OR <drug name> OR (<Solvents> AND NOT <other drug names>)) OR test OR chromatog* OR peak)	5,227	43,694
cGMP	whistleblow* /50 ("inspect*" OR "FDA" OR "Food /50 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "Agency" OR "recall" OR <medical conditions> OR <drug name> OR (<Solvents> AND NOT <other drug names>)) OR test OR chromatog* OR peak)	357	462

Exhibit C- Original Search Terms- High Hit Counts

Search Terms Report	Name	Hit	Hit W/ Fam
ANX.KEY.20200404.AuthorsInspectors.v1	Patel AND FDA	25,200	73,001
ANX.KEY.20200404.AuthorsInspectors.v1	Patel AND ANDA	22,708	70,631
ANX.KEY.20200404.AuthorsInspectors.v1	Min AND FDA	10,769	42,107
ANX.KEY.20200404.AuthorsInspectors.v1	Shah AND FDA	17,652	41,130
ANX.KEY.20200404.AuthorsInspectors.v1	Shah AND ANDA	11,331	28,216
ANX.KEY.20200404.AuthorsInspectors.v1	Min AND ANDA	5,372	26,958
ANX.KEY.20200404.AuthorsInspectors.v1	Young AND FDA	6,548	24,045
ANX.KEY.20200404.AuthorsInspectors.v1	Patel AND "Food and Drug Administration"	4,440	19,551
ANX.KEY.20200404.AuthorsInspectors.v1	Min AND "Food and Drug Administration"	3,933	18,692
ANX.KEY.20200404.AuthorsInspectors.v1	Young AND "Food and Drug Administration"	3,462	13,738
ANX.KEY.20200404.cGMP.v1	remov* AND test*	35,101	125,180
ANX.KEY.20200404.cGMP.v1	remov* AND FDA	29,103	100,733
ANX.KEY.20200404.cGMP.v1	delet* AND regulat*	30,218	99,842
ANX.KEY.20200404.cGMP.v1	remov* AND regulat*	25,389	97,508
ANX.KEY.20200404.cGMP.v1	delet* AND FDA	25,779	83,819
ANX.KEY.20200404.cGMP.v1	remov* AND inspect*	17,264	79,218
ANX.KEY.20200404.cGMP.v1	remov* AND ANDA	17,629	77,052
ANX.KEY.20200404.cGMP.v1	delet* AND ANDA	20,124	71,275
ANX.KEY.20200404.cGMP.v1	remov* AND blood*	13,527	69,354
ANX.KEY.20200404.cGMP.v1	remov* AND Agency	13,728	68,801
ANX.KEY.20200404.Entities.v1	Torrent AND HCTZ	20,705	47,344
ANX.KEY.20200404.Entities.v1	Torrent AND amlodipine*	15,808	39,970
ANX.KEY.20200404.Entities.v1	Torrent AND *Valsartan*	11,745	27,341
ANX.KEY.20200404.MedicalConditions.v1	blood* AND amlodipine*	4,048	19,969
ANX.KEY.20200404.MedicalConditions.v1	blood* AND HCTZ	3,201	12,723
ANX.KEY.20200404.MedicalConditions.v1	blood* AND *Valsartan*	2,726	11,890

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ANX.KEY.20200404.QA-Testing.v1	quality AND test*	52,102	142,112
ANX.KEY.20200404.QA-Testing.v1	validat* AND test*	41,254	118,676
ANX.KEY.20200404.QA-Testing.v1	fail* AND test*	32,250	99,931
ANX.KEY.20200404.QA-Testing.v1	toxic* AND test*	20,120	86,304
ANX.KEY.20200404.QA-Testing.v1	detect* AND test*	25,262	85,357
ANX.KEY.20200404.QA-Testing.v1	risk* AND test*	27,507	80,950
ANX.KEY.20200404.QA-Testing.v1	unknown* AND test*	21,902	78,008
ANX.KEY.20200404.QA-Testing.v1	problem* AND test*	19,918	74,113
ANX.KEY.20200404.QA-Testing.v1	recall* AND recall*	33,193	60,255
ANX.KEY.20200404.QA-Testing.v1	peak* AND test*	16,992	58,776
ANX.KEY.20200404.Regulatory.v1	inspect* AND FDA	29,749	96,678
ANX.KEY.20200404.Regulatory.v1	investigat* AND FDA	28,706	93,757
ANX.KEY.20200404.Regulatory.v1	warn* AND FDA	27,349	92,729
ANX.KEY.20200404.Regulatory.v1	CFR AND FDA	22,624	84,186
ANX.KEY.20200404.Regulatory.v1	CFR AND ANDA	20,970	76,889
ANX.KEY.20200404.Regulatory.v1	warn* AND ANDA	17,304	74,152
ANX.KEY.20200404.Regulatory.v1	inspect* AND ANDA	15,189	70,113
ANX.KEY.20200404.Regulatory.v1	alert* AND FDA	18,861	68,796
ANX.KEY.20200404.Regulatory.v1	warn* AND "Food and Drug Administration"	12,577	66,516
ANX.KEY.20200404.Regulatory.v1	CFR AND "Food and Drug Administration"	13,699	64,650
ANX.KEY.20200404.Standalone.v1	DMF	29,263	88,223
ANX.KEY.20200404.Standalone.v1	carcin*	20,176	75,765
ANX.KEY.20200404.Standalone.v1	genotoxic*	5,466	49,819
ANX.KEY.20200404.Standalone.v1	*nitra*	11,938	32,602
ANX.KEY.20200404.Standalone.v1	*23491*	2,086	8,295
ANX.KEY.20200529.cGMP.ExclOtherDrugNames.v1	remov* AND acid*	3,845	14,923
ANX.KEY.20200529.cGMP.ExclOtherDrugNames.v1	remov* AND hydrochlor*	2,647	11,635
ANX.KEY.20200529.cGMP.ExclOtherDrugNames.v1	delet* AND hydrochlor*	1,775	6,397

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ANX.KEY.20200529.cGMP.ExclOtherDrugNames.v1	delet* AND acid*	1,608	5,831
ANX.KEY.20200529.cGMP.ExclOtherDrugNames.v1	remov* AND N3*	1,089	2,231
ANX.KEY.20200529.EconomicTerms.ExclOtherDrugNames.v1	(ANDA AND market*) AND hydrochlor*	1,949	8,012
ANX.KEY.20200529.EconomicTerms.ExclOtherDrugNames.v1	(ANDA AND market*) AND acid*	1,249	5,735
ANX.KEY.20200529.Entities.ExclOtherDrugNames.v1	Torrent AND hydrochlor*	7,538	17,938
ANX.KEY.20200529.Entities.ExclOtherDrugNames.v1	Torrent AND acid*	5,358	15,231
ANX.KEY.20200529.Entities.ExclOtherDrugNames.v1	distribut* AND acid*	4,126	12,126
ANX.KEY.20200529.Entities.ExclOtherDrugNames.v1	ANDA AND hydrochlor*	3,866	11,635
ANX.KEY.20200529.Entities.ExclOtherDrugNames.v1	ANDA AND acid*	2,756	9,639
ANX.KEY.20200529.Entities.ExclOtherDrugNames.v1	distribut* AND hydrochlor*	2,751	9,110
ANX.KEY.20200529.Entities.ExclOtherDrugNames.v1	Torrent AND *azide*	3,248	6,592
ANX.KEY.20200529.Entities.ExclOtherDrugNames.v1	distribut* AND *azide*	1,075	3,131